

The attached contains
a correction in the
affidavit previously
filed on Nov. 6.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF INDIANA }
BELL TELEPHONE COMPANY, INCORPORATED, }
D/B/A AMERITECH INDIANA PURSUANT TO }
I.C. 8-1-2-61 FOR A THREE-PHASE PROCESS }
FOR COMMISSION REVIEW OF VARIOUS }
SUBMISSIONS OF AMERITECH INDIANA TO }
SHOW COMPLIANCE WITH SECTION 271(c) OF }
THE TELECOMMUNICATIONS ACT OF 1996 }

CAUSE NO. 41657

AFFIDAVIT OF JAMES D. EHR

James D. Ehr affirms under the penalties for perjury as follows:

1. I am Director of Performance Measures for Ameritech Corporation ("Ameritech"), a wholly owned subsidiary of SBC Communications Inc. My business address is 2000 West Ameritech Center Drive, Location 4G60, Hoffman Estates, Illinois 60196. I am over the age of 18 years, and have personal knowledge of the facts set forth herein.

2. My responsibilities include Ameritech's support of its wholly owned subsidiaries that are former Bell operating companies in Illinois, Michigan, Ohio, Wisconsin and Indiana ("Ameritech Companies"), the last of which is Indiana Bell Telephone Company, Incorporated ("Ameritech Indiana"). I am specifically responsible for development, implementation and ongoing administration of the Ameritech Companies' performance measurement system. This system allows each Ameritech Company, competing local exchange carriers ("CLECs") in its State. State regulators such as the Indiana Utility Regulatory Commission ("IURC") and the Federal Communications Commission ("FCC") to monitor and evaluate an Ameritech Company's performance in providing products, facilities and services to itself and to CLECs. I

Table 1: Estimated Incremental Annual Implementation & Compliance Costs	
Component	Annual Cost
Additional Staffing ²	\$2,960,000
Additional Information Technology Capital Expense	\$545,000
Year 1 Total Incremental Implementation & Compliance Costs	\$3,505,000
Additional Staffing	\$2,960,000
State-Specific Comprehensive Annual Audit (independent auditor costs only)	\$4,000,000
Subsequent Year Implementation & Compliance Costs	\$6,960,000

7. As noted, the additional implementation and compliance costs summarized in Table 1 exclude the additional costs of “mini-audits” that CLECs are authorized to request under the IURC Remedy Plan. The additional costs of each such “mini-audit” would exceed \$550,000 (assuming Ameritech Indiana is found at fault and required to pay the auditor costs), a figure that includes the components listed in Table 2 below:

²“Additional Staffing” represents salary and benefits costs for an additional 37 full-time equivalent staff required, beyond current performance measurement and remedy plan staff supporting Ameritech Indiana, to meet IURC Remedy Plan requirements, including without limitation the following: (1) annual comprehensive audit; (2) “root cause” analyses; (3) development and ongoing maintenance of additional Indiana-specific performance measurement system capabilities; (4) implementation and ongoing management of additional reporting, data retention and storage requirements; (5) implementation and ongoing management of “Interim Change Management Process Document” notification and publication process; and (6) “linkage mechanism” implementation, ongoing management and retention requirements.